

LESLIE A. FARBER, LLC

ATTORNEYS AT LAW

Of Counsel
Fred Shahrooz-Scampato, Esq.

HILLSIDE SQUARE
8 HILLSIDE AVENUE, SUITE 103
MONTCLAIR, NEW JERSEY 07042-2129
973.707.3322
973.860.1174 (fax)

E-mail: LFarber@LFarberLaw.com
Web page: www.LFarberLaw.com

December 18, 2020

Hon. John G. Koeltl, U.S.D.J.
United States District Court - Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: **Malibu Media v. John Doe subscriber assigned IP address 98.116.191.111**
Civil Action No. 1:19-cv-07189 (JGK)

Dear Judge Koeltl:

I represent the defendant in the above referenced case. As per our recent telephone conference about the motion we had filed [ECF no. 53] and my conversation today with Your Honor's courtroom deputy, below is a list of the documents filed on ECF we wish sealed or redacted versions substituted because these documents mention defendant's real name and/or address. In the original motion, we also seek an Order to show defendant's name on the public docket only as John Doe assigned IP address. Plaintiff consents to this request.

Documents:

1. Amended Complaint. [ECF No. 14].
2. Plaintiff's request for Summons to be Issued. [ECF No. 15].
3. Summons Issued. [ECF No. 16].
4. Proposed Order on Second Letter Motion for Extension of Time to Effectuate Service of Summons and Amended Complaint. [ECF No. 17-1].
5. Order on Second Letter Motion for Extension of Time to Effectuate Service of Summons and Amended Complaint. [ECF No. 28-1].
6. Third Letter Motion for Extension of Time to Effectuate Service of Summons and Amended Complaint. [ECF No. 21-1 Proposed Form of Order].

Hon. John G. Koeltl, U.S.D.J.

December 18, 2020

Page 2

7. Fourth Letter Motion for Extension of Time to Effectuate Service of Summons and Amended Complaint on Defendant. [ECF 23-1 Proposed Form of Order].
8. Order on Plaintiff's Fourth Letter Motion for Extension of Time to Effectuate Service of Summons and Amended Complaint on Defendant. [ECF 24].
9. Fifth Letter Motion for Extension of Time to Effectuate Service of Summons and Amended Complaint on Defendant. [ECF 27-1 Proposed Form of Order].
10. Order on Plaintiff's Fifth Letter Motion for Extension of Time to Effectuate Service of Summons and Amended Complaint on Defendant. [ECF No. 28 (last page)].
11. Sixth Letter Motion for Extension of Time to Effectuate Service of Summons and Amended Complaint on Defendant. [ECF No. 29-1 Proposed Form of Order].
12. Order on Plaintiff's Sixth Letter Motion for Extension of Time to Effectuate Service of Summons and Amended Complaint on Defendant. [ECF No. 30].
13. Motion for Alternative Service. [ECF No. 31 Motion, 31-1 Exhibit A, and 31-2 Proposed Form of Order].
14. Memorandum of Law in Support of Motion for Alternate Service on Defendant. [ECF No. 32].
15. Order on Motion for Extension of Time and Alternative Service on Defendant. [ECF No. 34].
16. Affidavit of Service of Process of Summons and Amended Complaint. [ECF No. 35].
17. Sixth Motion to Adjourn Initial Pretrial Conference and Extend the Deadline to File a Joint Discovery/case Management Plan. [ECF No. 36-1 Proposed Form of Order].
18. Proposed Clerk's Certificate of Default [ECF No. 38], supporting Declaration [ECF No. 38-1].
19. Clerk's Certificate of Default (entered). [ECF No. 39].
20. Motion for Entry of Final Default Judgment. [ECF No. 40 Motion, 40-1 Declaration, 40-3 Proposed Order to Show Cause].
21. Memorandum of Law in Support of Motion for Entry of Final Default Judgment. [ECF No. 41].
22. Declaration in Support of Motion for Entry of Final Default Judgment. [ECF No. 42].

Hon. John G. Koeltl, U.S.D.J.

December 18, 2020

Page 3

23. Notice of Filing. [ECF No. 43].
24. Statement of Damages. [ECF No. 44].
25. Order. [ECF No. 45].
26. Notice of Mailing. [ECF No. 46].
27. Letter dated August 11, 2020. [ECF No. 47].
28. Consent Order. [ECF No. 48].
29. Plaintiff's Notice of Settlement. [ECF No. 49].
30. Memo Endorsement on Plaintiff's Notice of Settlement. [ECF No. 50].
31. AO 121 Form Copyright - Case Terminated. [ECF No.52].
32. Motion to Seal and for Protective Order - Declaration of John Doe. [ECF No. 53-2].

If the Court wishes, we can supply redacted versions of the above documents. Feel free to contact the undersigned should you have any questions.

Respectfully submitted

/s/ Leslie A. Farber

Leslie A. Farber

LAF

cc: Kevin T. Conway, Esq. (*via ECF*)